

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

WILLA McLEAN and DANETTE RANGE,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

SKAGIT REGIONAL HEALTH and
CASCADE VALLEY HOSPITAL,

Defendants.

No. 2:18-cv-01567-RSL

STIPULATION AND ORDER
EXTENDING DEADLINES TO
RESPOND TO COMPLAINT AND TO
FILE CLASS CERTIFICATION
MOTION

STIPULATION

Plaintiffs and Defendants, through their undersigned counsel of record, have conferred regarding appropriate deadlines for Defendants to answer or otherwise respond to the Complaint in this putative class action [Dkt No. 1], and for Plaintiffs to file their proposed class certification motion. The proposed dates reflect an extension of approximately five weeks for Defendants to answer or otherwise respond to the Complaint, and for a corresponding extension of Plaintiffs' class certification motion deadline, in light of the intervening holidays and the parties' interest in allowing time for initial discussions about the case.

Without waiving any claims or defenses, the parties stipulate to and jointly request that January 31, 2019 be set as Defendants' new response date to the Complaint, and that June 3,

2019 be set as the new deadline for Plaintiffs to move pursuant to Local Rule 23(i)(3) for a determination under Fed. R. Civ. P. 23(c)(1) as to whether the case is to be maintained as a class action.

Accordingly, subject to the Court's approval, the parties agree as follows:

1. Defendants will file and serve their response to the Complaint by January 31, 2019.

2. Plaintiffs will file and serve their motion for a determination under Fed. R. Civ. P. 23(c)(1), as to whether the case is to be maintained as a class action, by June 3, 2019.

DATED this 28th day of December, 2018.

<p>FOSTER PEPPER PLLC</p> <p><u>s/Tim J. Filer</u> <u>s/Christopher G. Emch</u> Tim J. Filer, WSBA #16285 Christopher G. Emch, WSBA #26457 1111 Third Avenue, Suite 3000 Seattle, Washington 98101-3292 Telephone: (206) 447-4400 Facsimile: (206) 447-9700 Email: tim.filer@foster.com chris.emch@foster.com <i>Attorneys for Defendants Skagit Regional Health and Cascade Valley Hospital</i></p>	<p>KAZERNOUNI LAW GROUP, APC</p> <p><u>s/ Ryan L. McBride</u> <u>s/ Abbas Kazerounian</u> Ryan L. McBride, WSBA #50751 Abbas Kazerounian, WSBA #48522 1546 NW 56th Street Seattle, WA 98107 Telephone: (800) 400-6808 Facsimile: (800) 520-5523 Email: ak@kazlg.com ryan@kazlg.com <i>Attorneys for Plaintiff</i></p>
<p>HYDE & SWIGART</p> <p><u>s/ Joshua B. Swigart</u> Joshua B. Swigart, WSBA #49422 2221 Camino Del Rio S., #101 San Diego, CA 92108 Telephone: (619) 233-7770 Facsimile: (619) 297-1022 Email: josh@westcoastlitigation.com <i>Attorney for Plaintiff</i></p>	

1 **ORDER**

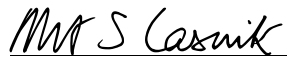
2 This matter having come before the court on the Stipulation of the parties, and good
3 cause having been shown,

4 IT IS HEREBY ORDERED that

5 1. The deadline for Defendants to respond to Plaintiff's Complaint is extended to
6 January 31, 2019.

7 2. The deadline for Plaintiffs to move for a determination under Fed. R. Civ. P.
8 23(c)(1), as to whether the case is to be maintained as a class action, is extended to June 3, 2019.

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10 Dated this 4th day of January, 2019.

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12 Robert S. Lasnik
13 United States District Judge
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